



Wanda I. Burget
Executive Director
Julie Lutz
Chairman

Emailed
AshleyForestPlan@usda.gov

November 7, 2019

Ashley National Forest
Attn: Forest Plan Revision
355 North Vernal Avenue
Vernal, UT 84078-1703

RE:

To Whom It May Concern:

On behalf of Wyoming Mining Natural Resource Foundation (Foundation) we thank you for the opportunity to comment on the draft Ashley National Forest Land and Resource Management Plan (LRMP) Revision.

The Foundation is a non-profit corporation dedicated to:

- Creating and supporting voluntary natural resource conservation and stewardship strategies, scientific research and educational outreach
- Partnering to develop cooperative, practical, and innovative solutions to natural resource challenges.

The impetus to form the Foundation was an outgrowth of a cooperative, voluntary conservation initiative led by the trona / soda ash industry in southwestern Wyoming with an objective of benefitting the Greater Sage-grouse and other sagebrush obligate species and conserving the habitat on which they depend in the context of the mining operations in southwestern Wyoming.

The Mining Industry Participants in this conservation strategy include Ciner Wyoming LLC (Ciner); Genesis Alkali Wyoming LP (Genesis); Solvay Chemicals Inc. (Solvay); and Tata Chemicals North America (Tata). The trona mining and processing operations associated with these Mining Industry Participants are all located within Sweetwater County, Wyoming west of the City of Green River. Some of the Foundation's Mining Industry Participants have

leases that are located within or in close proximity to the boundary of the Ashley National Forest.

The Foundation is developing a voluntary conservation strategy which will be directed by an integrated Agreement between the Foundation and federal agency partners including the U.S. Fish and Wildlife Service and the Bureau of Land Management. Effective implementation of the conservation measures included in this conservation strategy will require consistent and compatible management across federal, private and state properties. Because of the mixed property ownership associated with the Mining Industry Participants' mining and processing operations in Sweetwater County Wyoming, this Agreement comprises a Candidate Conservation Agreement with Assurances (applicable to non-federal property) with an integrated Candidate Conservation Agreement (applicable to federal property) (CCAA/CCA).

The Foundation respectfully requests that the revised Ashley National Forest LRMP recognize voluntary conservation initiatives generally and CCAA/CCAs specifically as viable conservation efforts to benefit candidate species and species of concern with language similar to the State of Wyoming Executive Order 2019-3 (Greater Sage-Grouse Core Area Protection) which states:

“Candidate Conservation Agreements with Assurances (CCAA) on private lands, complemented by Candidate Conservation Agreements (CCA) on public lands through the U.S. Fish and Wildlife Service, provide regulatory certainty and are a proven means of investing in the future of rural land management. CCAAs are a proven means to encourage voluntary conservation actions and measures.”

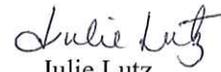
Further, the Foundation requests that the revised LRMP consider the opportunity for the Ashley National Forest to potentially play a role as a federal agency partner in integrated community-based voluntary conservation initiatives such as CCAA/CCAs. In this regard, we note that the National Forest Management Act of 1976, as amended, which provides overall direction to the USFS for conservation and management of public lands, allows the USFS to participate in conservation agreements.

Thank you for the opportunity to offer comment. Please feel free to contact Wanda Burget at wburget@accordresourcesolutions.com with any questions.

Sincerely,



Wanda Burget
Executive Director



Julie Lutz
Chairman